

Castel, J

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

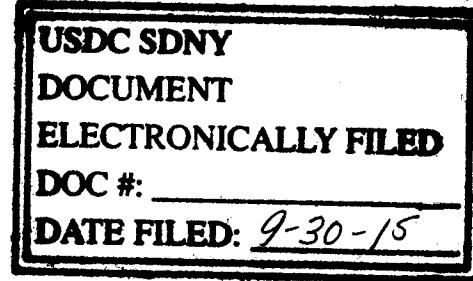
----- x  
 STEPHEN SULLIVAN, WHITE OAK FUND LP, :  
 CALIFORNIA STATE TEACHERS' :  
 RETIREMENT SYSTEM, SONTERRA CAPITAL :  
 MASTER FUND, LTD., FRONTPOINT :  
 PARTNERS TRADING FUND, L.P., AND :  
 FRONTPOINT AUSTRALIAN OPPORTUNITIES :  
 TRUST on behalf of themselves and all others :  
 similarly situated,

Plaintiffs,

Docket No. 13-CV-2811 (PKC)

STIPULATION AND [PROPOSED]  
SCHEDULING ORDER

v.  
 UBS AG, UBS SECURITIES JAPAN CO. LTD., :  
 MIZUHO BANK, LTD., THE BANK OF TOKYO- :  
 MITSUBISHI UFJ, LTD., THE SUMITOMO :  
 TRUST AND BANKING CO., LTD., THE :  
 NORINCHUKIN BANK, MITSUBISHI UFJ :  
 TRUST AND BANKING CORPORATION, :  
 SUMITOMO MITSUI BANKING :  
 CORPORATION, RESONA BANK, LTD., J.P. :  
 MORGAN CHASE & CO., JPMORGAN CHASE :  
 BANK, NATIONAL ASSOCIATION, J.P. :  
 MORGAN SECURITIES PLC, MIZUHO :  
 CORPORATE BANK, LTD., DEUTSCHE BANK :  
 AG, DB GROUP SERVICES UK LIMITED, :  
 MIZUHO TRUST AND BANKING CO., LTD., :  
 THE SHOKO CHUKIN BANK, LTD., SHINKIN :  
 CENTRAL BANK, THE BANK OF :  
 YOKOHAMA, LTD., SOCIÉTÉ GÉNÉRALE SA, :  
 THE ROYAL BANK OF SCOTLAND GROUP :  
 PLC, THE ROYAL BANK OF SCOTLAND PLC, :  
 RBS SECURITIES JAPAN LIMITED, :  
 BARCLAYS BANK PLC, BARCLAYS PLC, :  
 BARCLAYS CAPITAL INC., CITIBANK, NA, :  
 CITIGROUP, INC., CITIBANK, JAPAN LTD., :  
 CITIGROUP GLOBAL MARKETS JAPAN, INC., :  
 COÖPERATIEVE CENTRALE RAIFFEISEN- :  
 BOERENLEENBANK B.A., HSBC HOLDINGS :  
 PLC, HSBC BANK PLC, LLOYDS BANKING :  
 GROUP PLC, HBOS PLC, LLOYDS BANK PLC, :  
 ICAP PLC, ICAP EUROPE LIMITED, R.P. :  
 MARTIN HOLDINGS LIMITED, MARTIN :  
 BROKERS (UK) LTD., TULLETT PREBON PLC, :



BANK OF AMERICA CORPORATION, BANK  
OF AMERICA, N.A., MERRILL LYNCH  
INTERNATIONAL INCORPORATED, AND  
JOHN DOE NOS. 1-50,

Defendants.

----- x

Plaintiffs Stephen Sullivan, White Oak Fund LP, California State Teachers' Retirement System, Sonterra Capital Master Fund, Ltd., Frontpoint Partners Trading Fund, L.P., and Frontpoint Australian Opportunities Trust ("Plaintiffs") and Defendants ICAP plc and ICAP Europe Limited ("Defendants"), by and through their respective undersigned counsel, subject to this Court's approval, agree and stipulate as follows:

**RECITALS**

WHEREAS, on August 13, 2015, Plaintiffs filed a Fourth Amended Complaint (the "Complaint") against a group of defendants, including the undersigned Defendants;

WHEREAS, Defendants have agreed to accept service of the Complaint subject to the terms and conditions of the stipulation below;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

1. Defendants agree to accept service of the Complaint.
2. Defendants' time to answer, move to dismiss, or otherwise respond to the Complaint will follow the same schedule as the schedule that was so ordered by the Court on August 19, 2015. (Doc. 180.)
3. Except as to the defense of insufficient service of process, no defense of any Defendant, including without limitation, defenses based upon lack of personal jurisdiction, is prejudiced or waived by Defendants' executing, agreeing to, or filing this Stipulation or by agreeing to accept service of the Complaint.

4. This Stipulation may be executed in separate counterparts, and counterparts may be executed by e-mail or facsimile, each of which shall be an original.

SO ORDERED

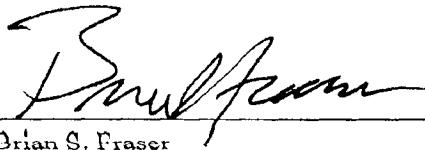
Dated: 9-29, 2015  
New York, New York

  
\_\_\_\_\_  
PAUL CASTEL  
UNITED STATES DISTRICT JUDGE  


Respectfully submitted on September \_\_\_, 2015 by:

  
\_\_\_\_\_  
Vincent Briganti  
Geoffrey M. Horn  
Peter D. St. Phillip  
Raymond Girnys  
Christian Levis  
Thomas M. Skelton  
Melissa Cabrera  
Michelle E. Conston  
LOWEY DANNENBERG COHEN & HART, P.C.  
One North Broadway, 5th Floor  
White Plains, New York 10601  
Telephone: (914) 997-0500  
ghorn@lowey.com  
vbriganti@lowey.com  
pstphillip@lowey.com  
rgirnys@lowey.com  
clevis@lowey.com  
tskelton@lowey.com  
mcabrera@lowey.com  
mconston@lowey.com

*Attorneys for Plaintiffs Stephen Sullivan, White Oak Fund LP, California State Teachers' Retirement System, Sonterra Capital Master Fund, Ltd., Frontpoint Partners Trading Fund, L.P., and Frontpoint Australian Opportunities Trust*



---

Brian S. Fraser  
Shari A. Brandt  
H. Rowan Gaither  
RICHARDS KIBBE & ORBE LLP  
200 Liberty Street  
New York, NY 10281-1003  
Telephone: 212.530.1800  
Facsimile: 212.530.1801  
bfraser@rkollp.com  
sbrandt@rkollp.com  
rgaither@rkollp.com

*Attorney for Defendants ICAP plc and ICAP Europe Limited*